2.0 STAKEHOLDER INPUT

Clear communication between FEMA's National and Regional Offices and community, regional, and state partners and many other stakeholders is critical to the acceptance and success of this MHIP and Map Modernization. Stakeholder input will continue to be of utmost importance to FEMA's planning process, including the ongoing evaluation and update of the MHIP.

2.1 Stakeholder Input Opportunities

As MHIP development continues, FEMA will continue to seek input from stakeholders.

FEMA has received input to the planning process during meetings with specific stakeholder groups and from reports and business plans submitted by partners in support of Map Modernization. The stakeholders who have provided input represent a wide range of groups. As the MHIP development and update process continues, FEMA will include additional stakeholders and seek continuous input from key stakeholders, with communication about Map Modernization at every level, resulting in better-informed stakeholders and users and better mitigation planning.

To date, FEMA has discussed the 5-year planning process with the following stakeholders:

- Local and state mapping partners, including CTPs
- Mapping Coalition and member organizations
  - American Congress on Surveying and Mapping
  - American Planning Association
  - American Public Works Association
  - American Society of Civil Engineers
  - Association of State Floodplain Managers
  - Association of State Wetland Managers
  - Coastal States Organization
  - National Association of Counties
  - National Association of Development Organizations
  - National Association of Flood and Stormwater Management Agencies
  - National Association of Home Builders
  - National Association of Realtors
  - National Flood Determination Association
  - National League of Cities
  - National Lenders Insurance Council
- Government Accountability Office
- Other Federal Agencies

Subsection 2.2, Input from Business Plans, provides an evaluation of the sequencing for Map Modernization flood map updates provided in some of the business plans. Subsection 2.3, Stakeholder Input Process, discusses the input and feedback process, focusing on updates to this plan. Subsection 2.4, Supporting Tools, discusses the tools that will be used to update the MHIP.

2.2 Input from Business Plans

As part of its broader effort to incorporate local, state, and regional involvement in flood mapping, FEMA had asked states, commonwealths, territories, and some CTPs with multi-jurisdictional responsibility for floodplain management to prepare Map Modernization plans in 2002. The plans included extensive mapping need assessments developed according to FEMA and other criteria.

In early FY04, FEMA made funds available to these same entities to upgrade and update their plans. FEMA received a total of 55 plans covering 48 states and four of the five water management districts that make up the state of Florida, as well as the District of Columbia and two territories. Among other things, the FY04 plans describe:

- The role each partner plans to play in project management
- The FEMA support required to effectively manage the implementation of the plan
- The integration of other state or Federal programs
- The projects to be completed each year of the 5-year program

In preparation for development of regional business plans, FEMA Regions reviewed and provided comments on the business plans. Sequencing of map production, as described by the business plans, has been and will continue to be used in the development of this MHIP. Information presented in this section is based on the 55 state business plans that were received by November 2004. Map 2-1 displays the states that submitted plans that are included in this document.

In determining the sequence of study projects, FEMA gave the greatest weight to factors that address mapping needs and annual program performance metrics. Table 2-1 lists factors identified in 10 or more business plans.

During the compilation, FEMA identified a total of 426 separate factors in the business plans. FEMA combined factors similar in meaning, reducing the count to 90 factors with different meanings. FEMA then grouped the factors into the following categories:

- Potential for loss of life or damage to property
- Potential for future development
- Leveraging partners' efforts: share data or cost, economy of scale (consistency with table)
- Availability and adequacy of existing maps

Map 2-1. Business Plans in Use

As of November 5, 2004

MHIP

Miles
0 37.575 150 225 300

Projection: North America Albers Equal-Area Conic
Data Source: FEMA Business Plan

Table 2-1. Factors Identified in 10 or More Partner Business Plans

Factor	Number of Plans Using Factor
Population growth	32
Population	27
Age of existing flood insurance maps	23
Known mapping needs (MNUSS or other sources)	19
Availability of base map, topographic, and flood hazard data	18
NFIP insurance policies	17
Repetitive losses	14
Population density	13
Availability of cost-sharing with local, state, and regional agencies	12
Completion of ongoing studies or map conversion	12
Accuracy/quality of existing maps and/or flood data	11
Existing or potential CTPs	10
Flood disaster declarations	10
Consistency with metrics	10
Number of Letters of Map Change (LOMCs)	10

- Degree of interest in floodplain management program
- Special considerations
- Other considerations

These categories represent the plans' recurrent areas of concern. Table 2-2 lists the 90 factors named in the business plans, grouped by category. Each business plan may have one or more factors listed within each category.

Table 2-2. Tally of Business Plans Using Each Category and Factor

Factor Category	(Number of Plans) Factor Involved in Evaluation of Mapping Priorities
Potential for Loss of Life or Flood Damage to Property (41 Plans)	(27) Population (17) Number of NFIP insurance policies (14) Repetitive losses (13) Population density (10) Flood disaster declarations (8) Number of claims (5) Decile, based on the national application of the FY03 funding distribution factors (4) Amount paid in claims (4) Number of communities (3) Rainfall intensity (2-year, 24-hour rainfall event) (3) History of flooding events (2) Disaster dollars spent (2) Excessive repetitive losses (2) Presence of unique flood hazard conditions (2) Value of NFIP policies (2) Total number of losses (2) Population growth/development along a watercourse (1) Amount of risk (1) Average amount paid per loss (1) Change in the number of households (1) Flood hazard risk in a county, based on the risk in the communities (1) Land use (1) Percent of the disaster covered (1) Policies affected by loss (1) Policy base per capita (indicator of the number of people and structures in the floodplain) (1) Potential for flood damage or loss of life (1) Presence of major watercourses (1) Repetitive loss areas not included in the CTP program (1) Review of the Post Storm Flood Hazard Verification data (assessment of risk) (1) Total cost in premiums paid (1) Total payment per property with loss (1) Housing density (1) Number of people affected by disasters (1) Areas without flood control projects

Factor Category	(Number of Plans) Factor Involved in Evaluation of Mapping Priorities
Potential for Future Development (40 Plans)	(32) Population growth (6) Potential for future development (4) Areas of high growth (3) Development rate or development since last map update (3) Number of Floodplain Development Permits issued (1) Number of building permits issued (1) Recent Base Flood Elevation change requests
Leveraging Partners' Efforts: Share Data or Costs, Economy of Scale (38 Plans)	(18) Availability of base map, topographic, and/or flood hazard data (12) Availability of cost-sharing with State, local, and/or regional agencies (12) Completion of ongoing studies or map conversion (7) Watershed or river basin approach (6) Leveraging (general) (6) Projects scheduled by Federal, State, regional, or other agency (3) Availability of GIS data (3) Availability of data from large-scale river studies (3) Availability of data/methodology for coastal studies (1) Completion of mapping projects in adjacent counties (1) Map maintenance needs (1) Shared Planning District Commissions
Availability and Adequacy of Existing Maps (37 Plans)	(23) Age of existing maps/FIRMs (19) Known mapping needs (MNUSS or other sources) (11) Accuracy/quality of existing maps and/or flood data (10) Number of Letters of Map Change (LOMCs) (6) Status of existing maps (digital, manual) (6) Unmapped communities with flood risk (5) Format of existing maps (countywide or community-based) (4) Stream miles mapped (4) Unmapped communities (2) Number of requests for LOMAs, LOMRs, and/or Physical Map Revisions (PMRs) (2) Recent flood events (2) Rank from 2002 priority list (1) Age of map index (1) Recent disasters (1) Unmapped communities participating in NFIP (1) Unmapped counties (1) Number of panels (1) Number of LOMCs as a percentage of NFIP policies

Factor Category	(Number of Plans) Factor Involved in Evaluation of Mapping Priorities
Degree of Interest in a Floodplain Management Program (18 Plans)	(7) Participation in NFIP (7) Community willingness and readiness to participate (2) Ability of the community to effectively administer the flood zones as mapped (2) Mapping requests made by community (1) Degree of interest shown by local governments in the area in utilizing flood data and maps in an effective floodplain management program
Special Considerations (20 Plans)	(10) Existing or potential CTPs (2) Political considerations, including congressional mandate (2) Urgency of mapping need (2) Input from state and local agencies (2) County area (1) Communities not receiving funding from the State or FEMA for mapping projects (1) Counties with low population and high mapping need (1) Distribution of projects between basins to prevent work overload (1) Successful working experience with communities
Other Considerations	(10) Consistency with metrics (3) Availability of funds (1) Addressing project backlog

Just as partners used different factors to evaluate communities and counties, they also used different steps in the evaluation and sequencing processes, as figure 2-1 illustrates. Generally, partners:

- Establish factors for determining sequence
- Collect data
- Evaluate that data for each county
- Create a sequence list

Partners collected data from a variety of sources, including county/community government officials, local floodplain administrators and hydrologists, state agencies, the U.S. Census Bureau, and MNUSS. States evaluated data either through a system by which each county was scored according to its characteristics or through a qualitative assessment of county characteristics. Both methods permit a relative evaluation to be made, with each county compared to all others in the state or district. Scoring systems categorize counties as "high," "medium," or "low" or assign a sequence. Approximately 40 percent of the plans sequenced all or a portion of counties, while approximately 60 percent of the plans did not include a sequence (for areas with more than one county).

In some cases, states used qualitative assessments to determine which counties should be mapped. Counties selected for inclusion then were sorted using quantitative or qualitative methods with adjustments made based on a secondary and sometimes a tertiary set of criteria to establish sequence.

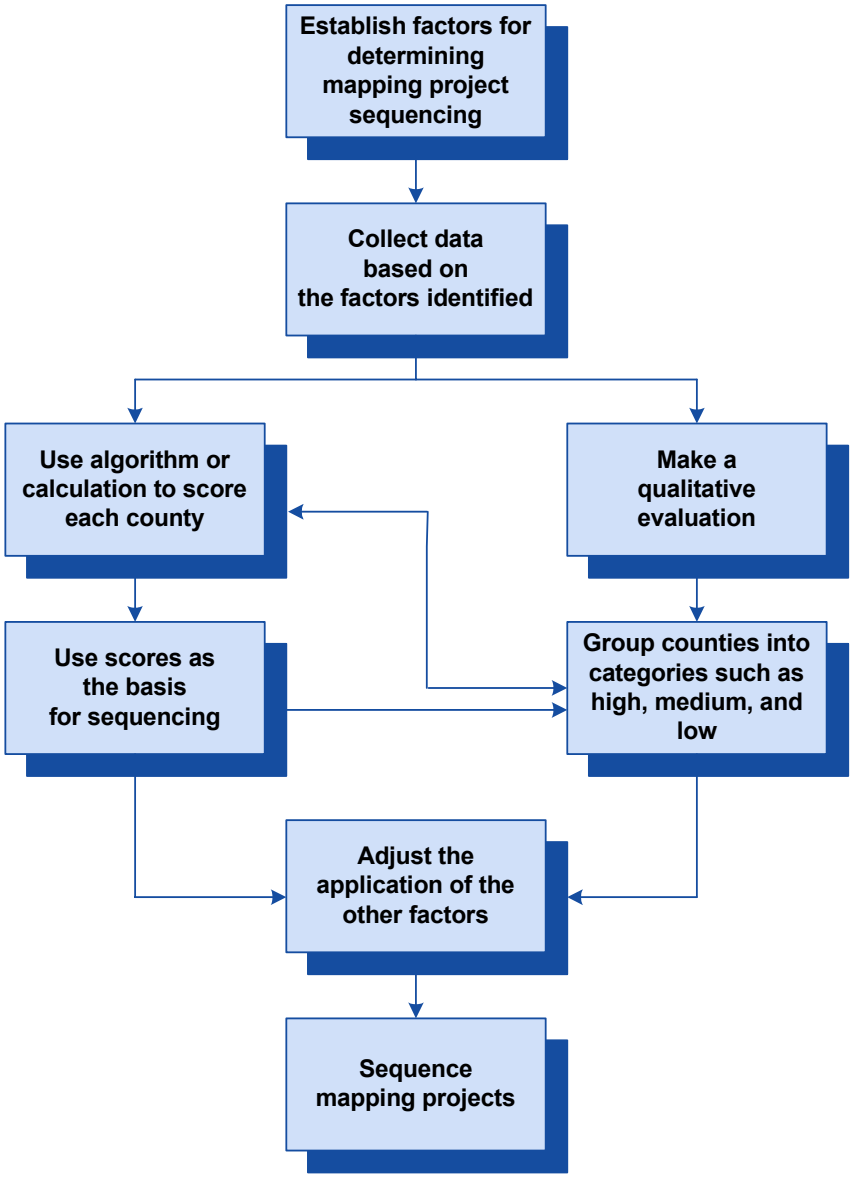

Figure 2-1. State Paths to Determining Sequence

States that considered anticipated or proposed funding levels in their qualitative assessments did so at different points in the evaluation process. Some states estimated project funding for each year in the 5-year program and then determined sequences that took into account the estimated cost of each study. Others used a preliminary sequencing list to propose a schedule for project starts and then scheduled studies to stay within each year's proposed budget. Of the states that submitted estimated costs as part of their business plans, many exceeded the resources available for that share of the Regions' budgets.

FEMA Regions then developed 5-year business plans. FEMA collected information from the Regions' draft business plans and FEMA regional engineers regarding the factors important in determining project sequencing, as well as the manner in which those factors would be applied.

The most frequently cited factors that FEMA Regional Offices expect to consider when determining project sequencing beginning in FY05 are input from state or local agencies, followed by factors relating to meeting program goals, such as leveraging existing data and establishing partnerships with CTPs. Several Regions expressed concern that the KPIs overemphasized population, but planned to meet the KPIs while addressing identified mapping needs in areas with the greatest risk.

To determine a sequence, Regions follow the process shown in figure 2-2, which is similar to that followed by the partners that prepared business plans. Section 5, FY05-FY10 Production Forecast, provides additional details on sequencing at the regional level.

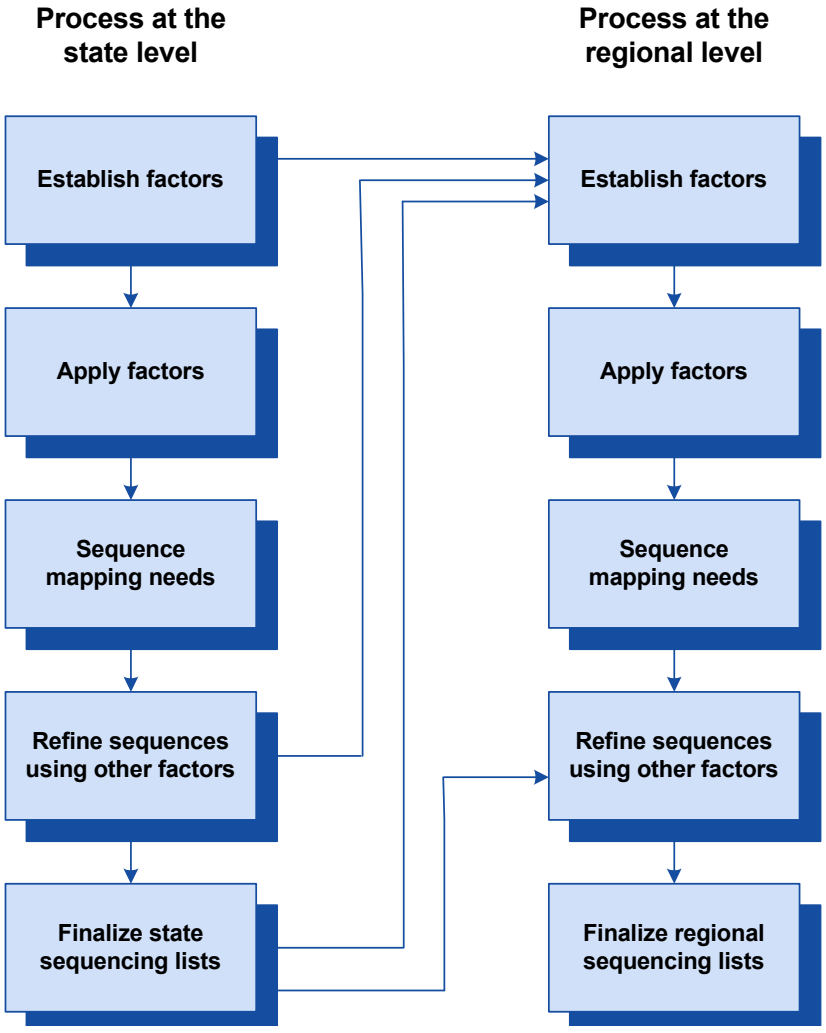

Figure 2-2. Regions' Mapping Need Sequencing Process

Regions gathered information from states and CTPs regarding priorities and factors important in sequencing. The points at which input from states or CTPs was possibly considered, are represented by lines in figure 2-2. Regions and stakeholders discussed draft plans and stakeholder priorities. Some Regions utilized state/CTP input as a primary factor, with a great deal of influence in sequencing projects. Other Regions used state/CTP input as a secondary factor, resulting in a resequencing a preliminary project list. Regions also met with state NFIP Coordinators individually to discuss state business plans.

2.3 Stakeholder Input Process

As mentioned earlier, stakeholder involvement is critical and a key component in maintaining the MHIP. FEMA based the initial sequencing on state business plans, regional plans, and national criteria. MHIP updates will incorporate additional input and finalized budget data. The process for updating the plans, the process for soliciting input after the annual MHIP update is released, and methods for providing input to future updates are described in the subsections that follow.

2.3.1 MHIP Update Process

MHIP updates follow a cyclical process. It includes publicizing the initial plan and updates; gathering stakeholder feedback and input from other sources; reviewing comments and making any appropriate changes; finalizing the parameters (primarily, Map Modernization funding for the new year); and publishing and publicizing the plan. FEMA remains very active during this cycle to obtain maximum stakeholder feedback and input on the plan, so that the MHIP will remain a flexible, "living" 5-year planning tool.

Figure 2-3 depicts the general process for gathering and incorporating stakeholder feedback/input and developing and distributing the MHIP and MHIP updates. FEMA developed the initial MHIP using joint planning materials such as mapping needs, state business plans, and regional business plans, within the overall program budget for Map Modernization.

FEMA gathers feedback throughout the year, and will produce two annual updates based on updated business plans and stakeholder comments. The updates also will address annual appropriations, new mandates, and other external factors (such as disasters).

Figure 2-4 shows how FEMA receives stakeholder feedback and input at three key points during the planning process: initial input, stakeholder feedback, and annual updates.

- **Initial Input:** Initial input is based on state business plans and regional business plans. Additional input comes from mapping needs identified by FEMA's Mapping Needs Assessment Process and MNUSS, FEMA's Biennial Report data submitted by communities (when available), status of ongoing projects, and other input from partners.

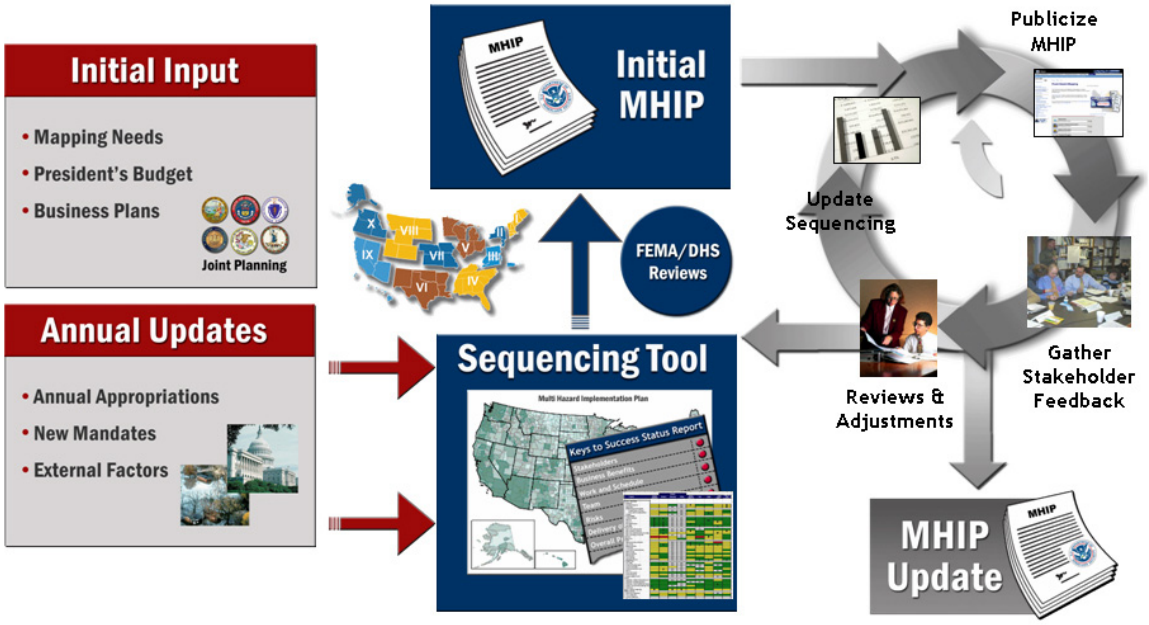

Figure 2-3. General Process for Gathering and Incorporating Stakeholder Input

- **Stakeholder Feedback:** Comments are submitted to FEMA through MHIP@floodmaps.net, discussion during town hall meetings at national conferences, and individual coordination meetings with stakeholder groups at the local, state, and national levels.
- **Two Semi-annual MHIP Updates:** Stakeholders are given the opportunity to analyze any updates to the initial inputs (including new state business plans), and continuously may submit their comments. FEMA also considers external factors such as Congressional input or disasters.

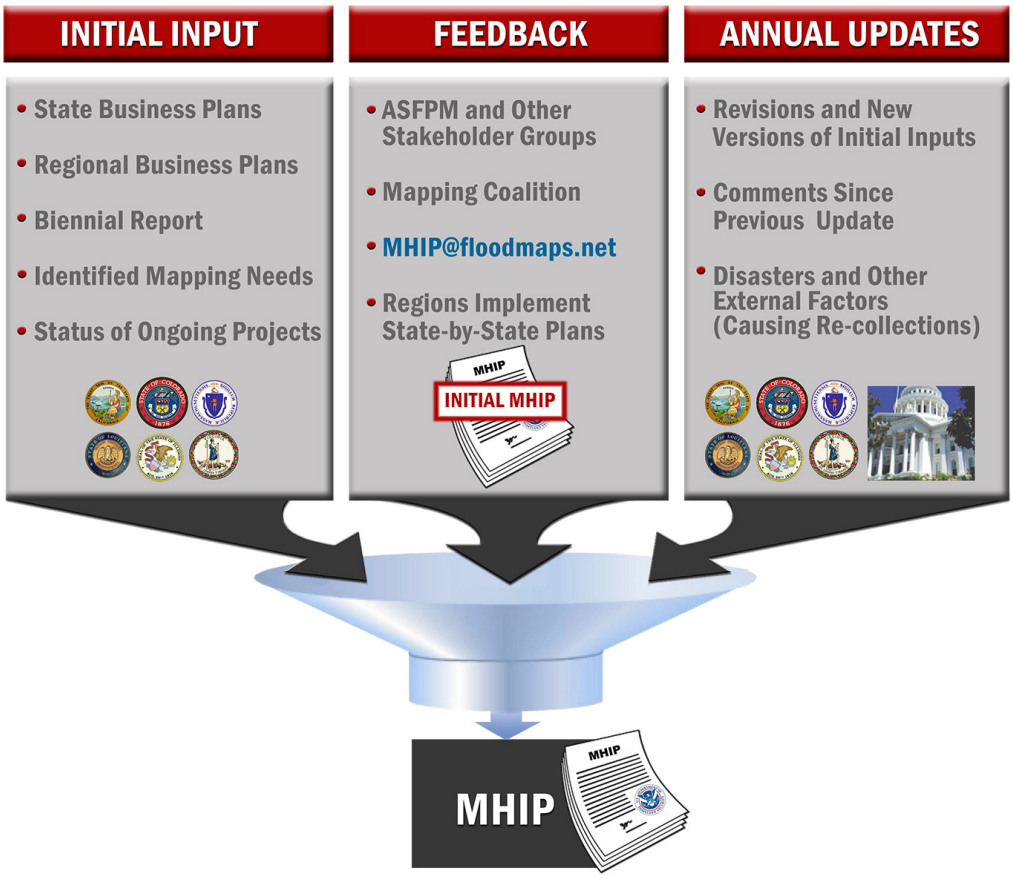

Figure 2-4. Stakeholder Input Process

2.3.2 *Publicizing & Seeking Feedback on the MHIP*

As part of its plan to continue to publicize the MHIP, FEMA will:

- Present briefings to Congress
- Present briefings at meetings with Mapping Coalition members and at the members' annual conferences
- Distribute informational flyers
- Send messages through the ListServ used to provide general Map Modernization updates
- Post the plan on the FEMA Flood Hazard Mapping Web site
- Provide "news clips" to professional and civic associations for use in their newsletters and other publications
- Include discussions of the plans in mapping-related training sessions and conferences

The MHIP will be posted on FEMA's Flood Hazard Mapping Web site. Interested parties will be able to inquire about how to obtain a copy, in electronic format, through MHIP@floodmaps.net.

2.3.3 Submitting Feedback on the MHIP

After distributing the MHIP, FEMA gathers and consolidates feedback at various points to ensure that stakeholders are submitting comments for consideration, enabling FEMA to maintain the national plan and partners to implement it. For instance, associations are requested to consolidate comments from their members. FEMA Regions consolidate comments from mapping partners within their jurisdiction. Local and state partners are empowered to make decisions in response to comments within their jurisdictions as long as they do not impact the national plan. If there are issues that may affect the national plan, then they must be addressed with the appropriate FEMA Region.

Table 2-3 lists some ways in which different entities may provide feedback to FEMA. Regional Offices will coordinate with the FEMA National Office. FEMA representatives also will be available to meet during conferences, association meetings, and other events. States are encouraged to talk with their FEMA Regional Office contacts. Regional entities and communities also should confer with their state or FEMA Regional contacts, depending on how roles and responsibilities are defined in their states. Association members should submit comments through their association leadership, who should provide a consolidated set of comments to FEMA.

Table 2-3. Opportunities to Provide Feedback

Entity	Process	Input to
State	State business planning process	FEMA Regional Offices
Local/Regional	Work with state officials, biennial reports; enter data into MNUSS	FEMA Regional Offices
Industry	Attend association meetings, provide feedback to Mapping Coalition members	FEMA Regional & National Offices

To make the process more convenient, comments can be submitted directly to MHIP@floodmaps.net. FEMA appreciates all comments from stakeholders and anticipates stakeholders will focus their reviews in the following areas:

- Concurrence on the state business plan analysis (for example, consolidation of factors—potential for loss of life or flood damage, potential for future development, leveraging of data, cost, and economies-of-scale, etc.)
- Project sequencing, given constraints of accuracy, cost, and schedule
- Ability to participate in the mapping process (for example, incentives that would make it more attractive, barriers that hinder involvement, anticipated level of involvement based on current sequencing)
- Issues related to the association between the level of study and for level of risk (section 7)

Figure 2-5 shows FEMA's process for gathering and integrating public comment. Reviewing comments and adjustments to the MHIP is a collaborative process. FEMA's National Office, working in close cooperation with Regions and partners, is responsible for making decisions. FEMA will review all comments and make adjustments based on analysis of the feedback received.

FEMA expects many comments from a variety of stakeholders to address common issues, and does not plan to contact stakeholders individually regarding every specific comment. FEMA will post a summary of comments and how those comments are being addressed on FEMA's Flood Hazard Mapping Web site (www.fema.gov/fhm) with the updated MHIP.

Input is critical to joint success. The latest version of the MHIP always will be available through FEMA's Web site, and comments can be submitted throughout the year at MHIP@floodmaps.net.

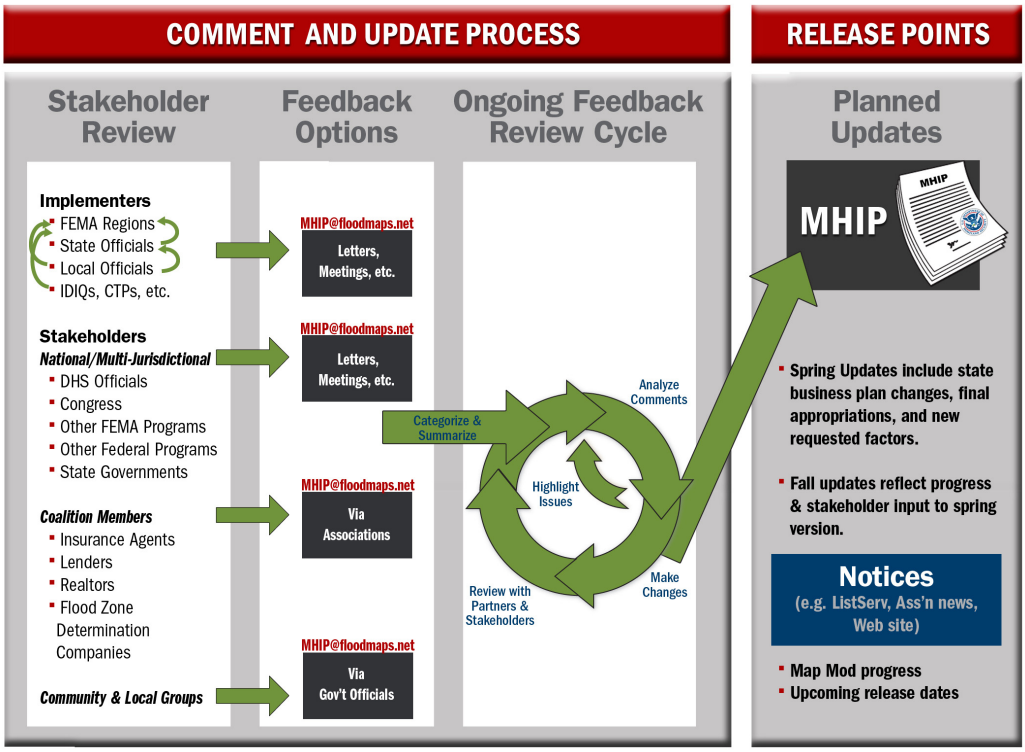

Figure 2-5. Process for Gathering and Integrating Public Comment

2.4 Supporting Tools

As part of the overall approach to Map Modernization, FEMA is implementing new tools to make the planning process, data collection, and management of all mapping projects more cost-effective and useful. For example, FEMA is implementing a new scoping tool to facilitate consistent nationwide scoping efforts.

In addition, the state business plan process will continue and business plans will continue to be integral parts of MHIP updates. FEMA will provide guidance for the upcoming year during the winter to enable plans to be submitted in the spring. FEMA will review these plans to determine whether they impact the MHIP or influence other parts of Map Modernization such as training or outreach.